



January 11, 2013

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Takeda Pharmaceutical Company Limited, et al. v. Zydus Pharmaceuticals
(USA) Inc., et al., Civil Action No. 3:10-cv-01723-JAP-TJB

John E. Flaherty
Partner
T. 973.639.7903
F. 973.297.3971
jflaherty@mccarter.com

Dear Judge Bongiovanni,

Pursuant to the Court's November 13, 2012 Letter Order (D.E. 274), we write on behalf of all parties to advise the Court that the parties have met and conferred and that there are currently no unresolved discovery issues. To the extent that new discovery issues arise between now and the call with the Court scheduled for January 17, 2013, the parties will promptly advise the Court. (Zydus supplemented its document production last night, and there is a 30(b)(6) deposition of Zydus scheduled for Tuesday, January 15, 2013.)

The parties further advise the Court that the parties have agreed to shift the opening supplemental expert report deadline currently set for January 15, 2013 (D.E. 264) to January 22, 2013, in order to permit Plaintiffs' expert to consider Zydus' recent document production in advance of his supplemental expert report; the parties have agreed that this change will not impact the close of the supplemental discovery period set for February 22, 2013 (D.E. 265). If Your Honor finds the proposed change acceptable, we ask that Your Honor "So Order" this letter.

Respectfully submitted,

s/John E. Flaherty

John E. Flaherty

cc: Counsel of record (via email)

SO ORDERED this ____ day of January 2013.

Hon. Tonianne J. Bongiovanni, U.S.M.J.

McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056
T. 973.622.4444
F. 973.624.7070
www.mccarter.com

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